

1 ADAM R. FULTON, ESQ.  
Nevada Bar No. 11572  
2 E-mail: afulton@jfnvlaw.com  
LOGAN G. WILLSON, ESQ.  
3 Nevada Bar No. 14967  
E-mail: logan@jfnvlaw.com  
4 **JENNINGS & FULTON, LTD.**  
2580 Sorrel Street  
5 Las Vegas, Nevada 89146  
6 Telephone: (702) 979-3565  
Facsimile: (702) 362-2060  
7 *Attorneys for Plaintiffs*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 JULIO CHIQUIN, an individual;  
JOAQUINA CHIQUIN, an individual;  
11 JUAN CARLOS DE PAZ-OCHOA, an  
individual, NINFA X. MAAS, an  
12 individual; NINFA X. MAAS, on behalf of  
her minor child, J.D.P.,

13  
14 Plaintiffs,

15 v.

16 J.B. HUNT TRANSPORT, INC., a foreign  
corporation; STEPHEN R. PALACIOS, an  
17 individual; DOES I-X, inclusive; and ROE  
CORPORATIONS I-X, inclusive,  
18

19 Defendants.  
20

CASE NO.: 2:21-cv-02119-JAD-DJA

**STIPULATION AND ORDER TO  
EXTEND ALL CASE DEADLINES**

**(Fourth Request)**

ECF No. 21

21 On January 20, 2022, the parties notified this Honorable Court that they reached an  
22 agreement for global settlement of this matter [Document 17]. Subsequently, this Court  
23 entered an Order on January 24, 2022 extending the deadline to file the opposition to the  
24 motion to remand until March 21, 2022, and requiring the parties to file a stipulated dismissal  
25 by March 21, 2022 [Document 18]. On March 22, 2022, the Court signed the parties  
26 Stipulated Request to Extend All Case Deadlines (Third Request) [Document 20].  
27

28 As this matter involves a minor, Plaintiff JUAN CARLOS DE PAZ-OCHOA was

1 required to file a Petition for Compromise of Minor's Claim ("Petition") in the Eighth  
 2 Judicial District Court, Case No. A-22-854078-M, regarding the approval for the  
 3 disbursement of settlement funds for the minor and to established a blocked account pursuant  
 4 to NRS 41.200. The order regarding the Petition is pending. Upon receipt of the order  
 5 granting the Petition, the parties will be able to finalize a settlement agreement and submit a  
 6 stipulation and order for dismissal with prejudice. Pursuant to LR IA 6-1, the parties are  
 7 requesting that all pending case deadlines, including the response to the Motion to Remand  
 8 filed by Plaintiffs on December 23, 2021, be extended by 90 days, and due on or before  
 9 September 21, 2022, if necessary. This is the Parties third request to extend all case deadlines,  
 10 and the fourth request to extend time to file Defendants' Opposition to the Motion for  
 11 Remand. This Stipulation is made in good faith with the intention of conserving time and  
 12 resources of the parties and the Court, pending the finalization of the settlement agreement.

13 Dated: June 20th, 2022

Dated: June 20th, 2022

14 **JENNINGS & FULTON, LTD.**

**MESSNER REEVES LLP**

15 By: /s/ Logan G. Willson, Esq.

By: /s/ Renee Finch, Esq.

16 ADAM R. FULTON, ESQ.

RENEE FINCH, ESQ.

17 Nevada Bar No. 11572

Nevada Bar No. 13118

18 E-mail: afulton@jfnvlaw.com

8945 W. Russell Rd., Suite 300

19 LOGAN G. WILLSON, ESQ.

Las Vegas, Nevada 89148

20 Nevada Bar No. 14967

Telephone: (702) 363-5100

21 E-mail: logan@jfnvlaw.com

Email: rfinch@messner.com

22 2580 Sorrel Street

Las Vegas, Nevada 89146

23 Telephone: (702) 979-3565

Facsimile: (702) 362-2060

*Attorneys for Plaintiffs*

**THORPE SHWER, P.C.**

WILLIAM L. THORPE, ESQ.\*

THOMAS D. ULREICH-POWER, ESQ.\*

*Attorneys for Defendants*

\*Admitted *pro hac vice*

**IT IS SO ORDERED.**

  
 UNITED STATES DISTRICT JUDGE

June 29, 2022